CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814-5512

October 23, 2001

Mr. Douglas Wheeler
GWF Power Systems Company, Inc.
4300 Railroad Avenue
Pittsburg, CA 94565

RE: TRACY PEAKER PROJECT FIRST SET OF DATA REQUESTS

Dear Mr. Wheeler:

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission requests the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, 4) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner, and 5) assess potential mitigation measures.

This set of data requests is being made in the areas of air quality, biological resources, cultural resources, geology and paleontology, hazardous materials, socioeconomics, traffic & transportation, transmission system engineering, visual resources, waste management and water and soil resources. Written responses to the enclosed data requests are due to the Energy Commission staff on or before November 13, 2001, or at such later date as may be mutually agreed.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send a written notice to me within 10 days of receipt of this notice. The notification must contain the reasons for not providing the information, the need for additional time and the grounds for any objections (see Title 20, California Code of Regulations section 1716 (e)).

If you have any questions regarding the enclosed data requests, please call me at (916) 657-4394.

Sincerely,

Cheri L. Davis
Energy Facility Siting Project Manager

Enclosure

cc: Dockets
Dave Stein

Technical Area: Air Quality
Author: William Walters and Lisa Blewitt

BACKGROUND

In the AFC, the temporary PM_{10} impacts from construction appear to be potentially significant. Additionally, there appears to be errors in the construction emissions calculations. Staff needs clarification of the construction emissions and modeling assumptions and additional modeling impact analysis to be able to assess the Applicant's analysis.

DATA REQUEST

1. Emission factors for CO, ROC, NO_x, SO_x, and PM_{10} (Appendix B, "Construction Equipment Emission Factors" Table) used for a 175 Hp forklift are incorrect. The emission factors shown are for a 50 Hp forklift. Please correct the construction emission factor and emissions tables appropriately.

2. AFC Tables 8.1-11 and 8.1-12 (pgs. 8.1- 46, 47) are based on 21.73 days per month and 20 hours per day for a period of nine months. Appendix B construction emissions calculations are based on 26.07 days per month and 20 hours per day for a period of nine months. Fugitive dust emissions are based on 10-hour workdays. In section 2.2.14 (pg. 2-21) and section 8.5.2.2 (pg. 8.5-8) construction is noted to be limited to 12 hours per day (6 a.m. to 6 p.m.), except when additional hours are necessary to make up schedule deficiencies or to complete critical construction activities. Please recalculate emissions on the same basis.

   a. Please clarify the daily and hourly construction schedules. Also identify the anticipated construction schedule for the on-site and linear facilities, identifying overlaps in the monthly construction schedule.

   b. Please provide corrected emission calculations if they are changed, or state if they are not.

   c. If the construction emissions modeling has incorporated hourly emission factors (i.e. temporal factors), please describe the methodology for incorporating these hourly adjustments.

   d. Please remodel on-site construction emissions using appropriate hour of day emission factors, if necessary, based on the heavy equipment operating schedule and any corrected emission calculations.

3. Emission estimates for the construction of the natural gas and water pipelines were not provided. Please provide construction emission estimates for the above construction efforts.

4. The diesel equipment SO_2 emissions (Table 8.1-13) appear to be based on 0.25% (2500 ppm) sulfur fuel (AP-42). This sulfur content is five times the California Motor Vehicle Diesel Standard. Please correct the emissions calculations and modeling results to reflect the use of 0.05% (500 ppm) sulfur diesel.

5. The modeled exhaust velocity (40 m/s) appears to be higher than can be reasonably expected, and the modeled exhaust temperature (200°F) appears to be lower than can be reasonably expected. Please provide documentation to confirm these values, or remodel using more appropriate values.

6. Please provide electronic copies of any new or revised construction modeling input/output files, including the additional modeling performed to support the information presented in the AFC Supplement (Table 8.1-18).

BACKGROUND

In the AFC, the applicant has concluded that the air quality impacts from project operation and commissioning will be insignificant. Staff needs additional information and clarification of specific technical issues to complete the review of the air quality impact analysis.

DATA REQUEST

7. Please describe each commissioning activity listed in the table on page 8.1-31 of the AFC. Include the following additional information:

    a. Fuel consumption data for each commissioning event.

    b. Vendor data and calculations to support the commissioning emissions including stack parameters for each commissioning event.

    c. A screening level modeling analysis of each of the commissioning events, using event specific exhaust parameters, to confirm that the modeling results do represent worst-case conditions.

    d. If this screening analysis indicates that another commissioning event represents worst-case, please remodel the commissioning emissions and present the revised modeling results.

8. The emergency diesel generator SO_2 emissions appear to be based on 0.25% (2500 ppm) sulfur fuel (AP-42). This sulfur content is five times the California Motor Vehicle Diesel Standard. Please correct the emissions calculations and modeling results to reflect the use of 0.05% (500 ppm) sulfur diesel.

9. The VOC emission estimates for startup and shutdown and initial commissioning are not provided. Please identify if the startup and initial commissioning VOC

estimates are guaranteed to be at or below the normal full load operating emission levels.

10. Please provide additional description of the initial commissioning, including the maximum duration of the commissioning period and total heat rate and emissions during initial commissioning.

BACKGROUND

The Applicant has indicated that the project meets all Best Available Control Technology Requirements; however, the Applicant is proposing a higher ammonia slip concentration (10 ppm @ 15% O_2) than is recommended in the CARB Guidelines for Power Plants (5 ppm @ 15% O_2). Staff needs additional information to identify whether the project will meet BACT for ammonia slip.

DATA REQUEST

11. Please explain why this project, as opposed to other proposed and certified projects, cannot meet an ammonia slip level of 5 ppm (@15% O_2). Also please identify measures, including increasing catalyst surface area, that might allow the project to meet the BACT guideline level for ammonia, and identify the associated costs of such measures.

BACKGROUND

Emission Reduction Credits (ERCs) from the same ERC holders are being used for the Henrietta Peaker Project and the Tracy Peaker Project. Staff needs additional information to be assured that there are sufficient ERCs identified for this project.

DATA REQUEST

12. Please provide documentation for the total number of ERCs available to GWF from the following ERC holder: VOC ERC S-1538-1; located at 2512 Coffee Road, Bakersfield

13. Please provide copies of purchase agreements or option contracts for all project ERC sources.

Technical Area: Biological Resources
Author: Nick Kautzman and Natasha Nelson

BACKGROUND

Section 2.2.1 of the AFC indicates the power plant area will be accessed via and improved 3,300 foot service road and Section 2.2.7.2 indicates a new 1,470-foot, 12-inch diameter line would be constructed to transport water to the TPP. However, the AFC gives no indication of how much disturbance would be created by the installation of these features. Staff needs the total number of acres that will be temporarily and permanently impacted, as well as a discussion of any potential impacts that may result from the construction of the water supply pipeline or access road. This information is needed in order to fully assess the potential biological impacts of the proposed project.

DATA REQUEST

14. Please provide a discussion of the potential impacts from the construction of the water supply pipeline and access road, including total number of acres temporarily and permanently impacted. Please update and resubmit tables to include the acres of impacts resulting from the construction on the water supply pipeline and access road.

BACKGROUND

Figure 2-3 of the AFC indicates a retention basin will be built on site, however this feature was not discussed in the Biological Resources section of the AFC. Staff requires information on the retention basin and its potential impacts to biological resources and any mitigation measures that will be put in place to reduce impacts to a less that significant level.

DATA REQUEST

15. Please provide a discussion of the potential for birds or other wildlife to use the retention basin on site during operation. If the basin water will contain contaminants, please provide a discussion of impacts and any mitigation necessary to reduce all impacts to less than significant levels.

BACKGROUND

Attachment 3.2-3 contains an excerpt from an Environmental Assessment, but information necessary to establish the relevance of this data; such as Author, Date of publication, etc., was not provided. In order to use this text and to know it is from a valid source, staff needs the citation information .

DATA REQUEST

16. Please provide the appropriate citation for the information contained in Attachment 3.2-3, including author, date of publication, and number of pages.

Technical Area: Cultural Resources
Author: Gary Reinoehl and Kip Harper

BACKGROUND

The AFC states that the applicant contacted Native American groups but received no comments. Staff needs to be made aware of any concerns from Native Americans that may have arisen since the time that the AFC was written.

DATA REQUEST

17. Since the time that the AFC was written, have there been any additional responses to the information sent to Native Americans by the applicant? If yes, please provide copies of any written responses and summaries of any responses made by telephone.

BACKGROUND

The AFC states that the applicant contacted local historical societies and archeological societies. Any additional information regarding concerns of local historical societies and archeological societies is needed for the staff analysis.

DATA REQUEST

18. Since the time that the AFC was written, have there been any additional responses to the information letters sent to local historical societies and archeological societies by the applicant? If yes, please provide copies of any written responses and summaries of any responses made by telephone.

BACKGROUND

According to the AFC, the proposed water line will connect to an existing Delta-Mendota Canal turnout. Staff recently received e-mail from the applicant that indicates that the interconnection will be to a different turnout than specified in the AFC. Staff needs clarification in order to perform the analysis.

DATA REQUEST

19. Will the proposed water line connect to the Delta-Mendota Canal Turnout 1187 LT, or to Delta-Mendota Canal Turnout 12.37 LT? Please clarify which turnout will be used for the project.

BACKGROUND

According to the AFC, the water pipeline will connect to an existing Delta-Mendota Canal turnout. Staff needs additional information regarding the turnout in order to evaluate the historical significance of the structure and possible project impacts.

DATA REQUEST

20. If the Delta-Mendota Canal Turnout (1187 LT or 12.37 LT, whichever is being used) was originally constructed as an integral part of the Delta-Mendota Canal, then please evaluate the significance of the Delta-Mendota Canal. Please record the segment of the Delta-Mendota Canal within one mile of the project site. Please provide copies of completed DPR 523 forms for the Delta-Mendota Canal with a context for the entire canal. The form should provide a discussion of the significance of the structure under CEQA Section 15064.5, (a), (3), (A)(B)(C) & (D). The forms should be completed by an architectural historian that meets the Secretary of the Interior's standards for an architectural historian.

21. If the Delta-Mendota Canal Turnout (1187 LT or 12.37 LT, whichever is being used) is not part of the original construction of the Delta-Mendota Canal but is more than 45 year of age, please provide copies of completed DPR 523 forms. The form should provide a discussion of the significance of the structure under CEQA Section 15064.5, (a), (3), (A)(B)(C) & (D). The forms should be completed by an architectural historian that meets the Secretary of the Interior's standards for an architectural historian.

BACKGROUND

The proposed water line will connect to an existing Delta-Mendota Canal turnout. Staff needs additional information to perform the analysis.

DATA REQUEST

22. Is a permit or some other action required from the Bureau of Reclamation (BOR) prior to interconnection with the turnout? Please provide a copy of the permit or written communication from the BOR indicating that there is no action required from the BOR for the interconnection.

23. If a permit from the Bureau of Reclamation is required, will the project be required to comply with Section 106 of the National Historic Preservation Act? Please provide staff with a tentative schedule for the Section 106 compliance (submittal and completion).

BACKGROUND

The proposed access road will impact a Union (Southern) Pacific Railroad (CA-SJO-250H) crossing. According to the AFC, JRP Historical Consulting Services recorded and evaluated a segment of this railroad that lies within the survey corridor of this project. JRP found that the segment of CA-SJO-250H lacked integrity and was ineligible for the National Register. Staff needs to review the background information in order to make an independent evaluation of the significance of the crossing to be impacted by the GWF Tracy project.

DATA REQUEST

24. Please provide a copy of the JRP Historical Consulting Services report (Hatoff 1995) so that staff may make an independent assessment on the significance of the impact to the railroad crossing.

Technical Area: Geology and Paleontology
Author: Neal Mace

BACKGROUND

While Section 8.15 of the AFC discusses the Coast Range-Sierra Block Boundary Zone and Table 8.15.1 indicates that it is located within one kilometer of the project site, it is not addressed in the Appendix J1-3 (Preliminary Geotechnical Investigation) discussion of the 1997 Uniform Building Code near source factors. Appendix J1-3 determined the near source factors using the Greenville fault, located 15 kilometers to the west and the Calaveras fault, located 36 kilometers to the west. Both the Greenville fault and the Calaveras fault are classified as Type B faults. The Coast Range-Sierra Block Boundary Zone (aka Great Valley fault zone) is also a Type B fault and is located much nearer to the site than the Greenville or Calaveras faults.

DATA REQUEST

25. Please revise the near source factors reported in Appendix J1-3, Page 7, to reflect the proximity of the Coast Range-Sierra Block Boundary Zone.

Technical Area: Hazardous Materials
Author: Alvin Greenberg, Ph.D.

BACKGROUND

AFC Section 8.12.3.3 contains a description of the design of the aqueous ammonia storage tank and transfer pads but a diagram or preliminary design drawings are not included. Staff needs to be assured that the design is adequate and is consistent with the offsite consequence analysis.

DATA REQUEST

26. Please provide a schematic figure or preliminary design drawings of the aqueous ammonia storage tank and transfer pads.

Technical Area: Socioeconomics
Author: James Adams

BACKGROUND

With respect to the four-month review process, Section 25552 (d) (3) of the Public Resource Code requires an applicant to contract with a general contractor and contract for an adequate supply of skilled labor to construct, operate, and maintain a thermal power plant. For the Commission to make a finding that Section 2552 (d) (3) has been satisfied, staff needs to be assured that contracts are in place for the required labor.

DATA REQUEST

27. Please provide evidence of a contract with a general contractor and contract(s) with one or more sources of skilled labor to construct, operate and maintain the proposed project, to include associated linear facilities.

Technical Area: Traffic and Transportation
Author: David Young

BACKGROUND

Staff needs to be able to evaluate potential impacts and LORS compliance associated with proposed improvements to the existing dirt access road.

DATA REQUEST

28. Please specify all improvements to be made on the access road. In addition, discuss all encroachment permits, easements and agreements affecting public and private property required prior to the start of improvements.

29. Discuss how improvements comply with local LORS in regards to public safety and fire access.

BACKGROUND

In the AFC, on page 8.10-12, regarding workforce and visitor parking, it is assumed that "parking for the construction workforce and visitors will be provided west of (adjacent) the TPP plant site."

DATA REQUEST

30. Please provide a detailed description of parking facilities during the construction and operational phases of the project.

31. Please indicate if transportation will be available from central parking area to plant site and linear facilities.

BACKGROUND

Some equipment components will need to be delivered via rail using the Union Pacific rail corridor bordering the TPP site. Staff needs to know the location of the rail spurs to be used and the related roads.

DATA REQUEST

32. Please discuss the location of spur(s) used for unloading and indicate which roadways or access roads to be used from the spur(s) to the project site.

BACKGROUND

The AFC addresses Construction Equipment and Material Deliveries. Most materials, including hazardous materials, are assumed to be transported from areas in San Joaquin and Contra Costa Counties.

DATA REQUEST

33. Please indicate specific routes of hazardous material deliveries and disposal during construction and operational phases of the project.

BACKGROUND

In the AFC, page 8.10 -18 Section 8.10.3.4, The Cumulative Effects discussion for Traffic and Transportation states that there are no other known proposed projects planned or under construction whose workforce and/or material deliveries would concurrently travel the same state routes and local roadways. However, according to the San Joaquin County Community Development Department, there are a number of projects proposed in the vicinity of the TPP plant site

DATA REQUEST

34. Please list all proposed or planned projects in the vicinity of the project site and discuss the potential cumulative impacts to transportation systems.

BACKGROUND

Construction of the TPP's proposed five-mile, 230-kv electric transmission line has the potential to affect the local and regional transportation network.

DATA REQUEST

35. Please indicate how transmission-line construction and associated lane closures will impact local traffic flow during construction.

36. Please indicate the types of traffic control programs that will be used to ensure safe road conditions, (such as lane marking, construction notices, roadway signage, detours, flagperson, etc.).

37. Please indicate the areas that will be used in linear construction activities for workforce parking and the laydown of equipment and supplies.

TECHNICAL AREA: Transmission System Engineering
Authors: Ajoy Guha, P. E. and Richard Minetto

BACKGROUND

Staff needs a complete interconnection study to analyze the reliability impacts and to be confident of identifying the interconnection facilities and any downstream facilities necessary to support interconnection of the Tracy Peaker Project to the Pacific Gas and Electric (PG&E) system or any other Transmission Owner's (TO) system. Such interconnection should comply with Utility Reliability and Planning Criteria, North American Electric Reliability Council (NERC) Planning Standards, Western Systems Coordinating Council (WSCC) Reliability Criteria, and California Independent System Operator (Cal-ISO) Reliability Criteria.

The study filed with the AFC (Application for Certification) was for interconnection of 252 MW generation with 2003 summer peak conditions for the adjacent 230 kV transmission system. Staff understands that a new interconnection study performed by PG&E is being published for a 252 MW interconnection in 2003 summer peak and spring (off-peak) system conditions to PG&E 115 kV transmission system. Staff notes that the current Application for Certification (AFC) is for 169 MW generation interconnection in July, 2002. Staff therefore needs a study with complete information based on 169 MW interconnection in order to assess transmission system impacts in 2002 summer peak and spring (off-peak) system conditions. This study and its impacts should be coordinated with adjacent TO systems.

DATA REQUESTS

38. Please provide a System Impact Study prepared by PG&E or the Transmission Owner (TO). Please provide the study based on the proposed plant of 169 MW nominal output per the Application for Certification (01-AFC-16), and include all system impacts and mitigation alternatives considered and then selected for 2002 summer peak and spring (off-peak) system conditions.

    a. Please analyze system with and without the project under stressed (peak and/or off-peak) conditions as stated above for the following:

        i) Load flow analysis
            - n-0 (normal condition)
            - Important n-1s1 (Single contingencies & PG&E Category B contingencies)
            - Critical n-2s (Double contingencies & PG&E category C contingencies)

        ii) Transient stability analysis and post transient voltage analysis

[1] For a limited scope study, in discovery staff and/or the Cal-ISO may conclude that additional n-1 & n-2 outages may be necessary to determine conformance with WSCC, NERC, and Cal-ISO reliability criteria. Given the short 4 month process a limited scope study may cause process delays.

iii) Fault current analysis.

b. Please identify the major study assumptions in the base cases such as imports, exports, major hydro generation and all the proposed queue generation operational in the study area before Tracy project. Please identify the reliability and planning criteria utilized to determine criteria violations.

c. Power flow diagrams (MW/%) must be provided for bases with and without the project. Power flow diagrams must be provided for all n-0, n-1 and n-2 studies where overload or voltage criteria violations occur.

d. Please provide a list of all contingencies evaluated.

e. Please provide one table listing the pre and post project n-0 and contingency percentage overload & voltage criteria violations with differences (delta). Please also identify the mitigation measures considered and selected.

f. Please provide one table with pre and post project fault currents, and the normal and short circuit ratings of Circuit Breakers for the substations where fault currents will increase with the interconnection of the project. Please identify the mitigation measures considered and selected.

g. Please provide electronic copies of the PSLF *.sav & *.drw files of the base cases, and EPCL and/or AUTOCON contingency files.

Technical Area: Visual Resources
Author: Joe Donaldson

BACKGROUND

The AFC (Supplement October 2001) states on page 3.11-3 that I-580 is identified as a scenic route in the San Joaquin County General Plan. It is not clear whether this is a county or state designation.

DATA REQUEST

39. Please explain whether the portion of I-580 between the Alameda and Stanislaus County lines is a state- or county-designated scenic route.

40. If it is a state-designated scenic route, please identify any additional policies or regulations that may apply to views of the project from the highway.

BACKGROUND

The AFC states on page 8.11-7 that "traffic on I-580 would have fleeting views of the TPP." Although it appears that views of the project site for east-bound traffic would be brief and intermittent, it appears that some views for westbound traffic on I-580 would be more open and of longer duration. However, the AFC does not provide a detailed description of views of the project site from this designated scenic route.

DATA REQUEST

41. Please provide a detailed description of the views of the project site from the I-580 designated scenic route, and describe the sensitivity of viewers travelling on the highway.

42. Please identify a new KOP, in consultation with CEC staff, along west-bound I-580 with a view toward the project site. Locate the KOP at the closest point that has an unobstructed view of the project site within the normal cone of vision. Please provide 4 sets of 11" x 17" high-resolution photocopies of a photograph of the project site from this location and of a visual simulation of the project.

BACKGROUND

On page 8.11-4, the AFC describes the area surrounding the project site as "characterized by mixed uses, including …a limited number of residences in the project viewshed that may be considered potentially sensitive land uses." However, there appears to be a large number of residences within the near middleground (i.e., within approximately 1 mile) of the project site that potentially would have views of the project.

DATA REQUEST

43. Please identify all residences within approximately 1 mile of the project site that potentially would have views of the project. Please revise Figure 8.11-1 to show the location of each of the residences.

44. Please provide detailed descriptions of the existing views of the project site and visual impacts of the project for views from these residences and residential areas.

BACKGROUND

Residences located northeast of the intersection of West Schulte Road and Lammers Road appear to have open views of the project site. However the AFC does not describe these views and potential project impacts in detail.

DATA REQUEST

45. Please identify a new KOP, in consultation with CEC staff, for views of the project site by residences located northeast of the intersection of West Schulte Road and Lammers Road and specify the precise location of the KOP. Please provide detailed descriptions of the existing views of the project site and of visual impacts of the project for views from the area of this KOP.

46. Please provide 4 sets of 11" x 17" high-resolution photocopies at life-size scale of a photograph of the existing view toward the project site and of a visual simulation of the proposed project from the new KOP.

BACKGROUND

The AFC mentions on page 8.11-4 that the Delta-Mendota Canal and California Aqueduct are within the general area affected by the project. Regarding KOP-7, a location along the Delta-Mendota Canal access road which runs adjacent to the project site, the AFC states on page 8.11-4 that "viewers are unlikely to be present at this location, as the road is not used for general public access." On page 8.11-13, the AFC states that "KOP-7 is a canal access road that is not used by the general public." However, it appears that the road along the canal is open to general public access for fishing and possibly other public recreation uses. In addition, the California Aqueduct access road is a public recreation trail. Recreationists using these access roads would have foreground and near middleground views of the project. Also, it appears that there may be other designated bicycle routes or recreation trails in the project area.

DATA REQUEST

47. Please describe the amount and types of recreational use for both the Delta-Mendota Canal and California Aqueduct for portions of these features with potential views of the project.

48. Please provide detailed descriptions of the existing views of the project site and visual impacts of the project for views from the trails along the Delta-Mendota Canal and California Aqueduct and any other recreation features in the project area, including designated bicycle routes or other trails.

49. Please describe any measures that would be used to reduce visual impacts of the project for views from the trails along the Delta-Mendota Canal and California Aqueduct and any other recreation features in the project area, including designated bicycle routes or other trails.

50. Please revise Figure 8.11-1 to show the location of all recreation trails and other recreation features in the project area with potential views of the project.

51. Please amend the discussion of KOP-7 in the AFC to include information about views by recreation users from this location.

BACKGROUND

The AFC mentions on page 8.11-1 that the project includes a 5.2-acre area west of the plant fence line and within the 40-acre parcel that would be used as a construction laydown and parking area. However, the AFC does not describe the visual impacts for views of the laydown area nor does the visual resources section of the AFC describe how long the laydown area would be in use or how it would be used or treated following completion of project construction.

DATA REQUEST

52. Please revise Figure 8.11-1 to depict the location and configuration of the 5.2-acre construction laydown area.

53. Please provide a detailed description of the existing views of the construction laydown area and the visual impacts of the laydown area for views from surrounding features and areas, including residences and recreation features.

54. Please describe any measures that would be used to reduce visual impacts of the construction laydown area.

55. Please estimate how long the laydown area would be in use.

56. Please describe how the construction laydown area would be used or treated following completion of project construction.

BACKGROUND

On page 8.11-13, the AFC describes the visual impacts of light and glare for the project. However, it does not appear that the AFC describes the existing conditions of light and glare in the project area that would provide a baseline for assessing the visual impacts of light and glare for the project.

DATA REQUEST

57. Please provide a detailed description of the existing conditions of light and glare in the project area. Please use this baseline to assess the visual impacts of light and glare for the project.

BACKGROUND

On page 8.11-4, the AFC Supplement (October 2001) recommends submittal of a landscape plan for the facility "that will serve to buffer the visual appearance of the facility from Interstate 580." However, the AFC does not describe or depict in visual simulations how landscaping would serve to buffer the project's appearance or help mitigate visual impacts of the project. In addition, landscape treatment should serve to help soften the appearance of the facility and help blend the project with its surroundings for views from residences, roads, and recreation features in the area. Staff requires a landscape plan as soon as possible to assist in performing Staff's visual analysis.

DATA REQUEST

58. Please provide a conceptual landscape plan for the project that shows landscape treatment, including grading, fences, and other elements and plants appropriate for the local conditions arranged in a manner that would soften the appearance of the facility and help blend the project with its surroundings. In addition, the landscape treatment should serve to help reduce visual impacts of the facility for views from other locations and features, including residences, roads, and recreation features in the area. The conceptual landscape plan should identify the types of plants; their expected growth rates for the local climate, soil, and other site conditions; the expected plant heights at the time of planting, 5 years after planting, and plant maturity; and the anticipated amount and source of water required to sustain the plants.

59. Please provide a detailed description of how the proposed landscape treatment for the project would reduce visual impacts and help blend the project with its surroundings.

60. Please provide 4 sets of 11" x 17" high-resolution photocopies of visual simulations at life-size scale of the proposed project with landscaping treatment a) at five years after planting and b) at maturity from KOP-1, KOP-5, KOP-7, and all new KOPs requested in this set of data requests.

BACKGROUND

Figure 8.11-1 in the AFC shows a railroad line running next to the project site. However, the AFC does not describe whether passenger trains use this railroad.

DATA REQUEST

61. Please explain whether the railroad line running next to the project site carries passenger trains. If passenger trains use the railroad line, please indicate the schedule of service past the site, estimate the length of time that passengers would have a view of the site, and provide a detailed description of the views of the site and project from the trains.

BACKGROUND

Staff will need to include all photographs, visual simulations, and maps from the visual resources section of the AFC in the Staff Assessment.

DATA REQUEST

62. Please provide electronic files of all photographs, visual simulations, and maps from the visual resources section of the AFC and from responses to this set of data requests.

BACKGROUND

Some of the visual simulations appear to use lens settings that do not accurately represent views from the KOP locations. In particular, photographs from KOPs 1 and 7 appear to use wider angle lens settings than some of the other photographs.

DATA REQUEST

63. Please describe the techniques, including lens angle settings, used for taking the photographs used for the visual simulations. If different lens angle settings were used, please explain whether and how the photocopies of photographs of the existing site and of visual simulations of the proposed project from the KOPs are at life-size scale.

BACKGROUND

The existing view and visual simulation for KOP-5 (Figures 8.11-6 and 8.11-13) show what appears to be the roof of a residence between the KOP and the project.

DATA REQUEST

64. Please identify whether the structure located between KOP-5 and the project shown in Figures 8.11-6 and 8.11-13 is a residence. If it is a residence, please identify this as a new KOP and provide a detailed description of the existing views and visual impacts of the project from the area of the residence.

BACKGROUND

A water tower, industrial structures, and other structures located near the project site are visible in most of the visual simulations and serve as important scale references in the simulations. However, the visual resources section of the AFC does not identify the heights of these structures and the water tower is not shown and labeled on Figure 8.11-1.

DATA REQUEST

65. Please show and label the location of the water tower on Figure 8.11-1 and identify the heights of the water tower, industrial structures, and other structures located near the project site.

BACKGROUND

The AFC Supplement (October 2001) on page 3.11-1 states that "the TPP has been modified to eliminate the construction of offsite transmission facilities" and "KOP-6 should be ignored." However, it is not clear if the other visual simulations are still accurate with regard to the modified project.

DATA REQUEST

66. Please explain whether the description in the AFC and visual simulations other than for KOP-6 are still accurate with regard to the modified project. If the description and simulations are not still accurate, please describe the visual impacts of the modified project and revise the visual simulations appropriately.

Technical Area: Waste Management
Author: Alvin Greenberg, Ph.D.

BACKGROUND

The State of California requires a minimum of 50% of all solid waste generated to be recycled. The 20 cubic yards of non-hazardous waste the applicant intends to recycle every two to three weeks during construction presents less that 50% of the 40 cubic yards a week the applicant expects to generate (AFC p. 8.13-2). Furthermore, the AFC does not provide information on the amounts of recycling the applicant intends to do on operation waste. This information is necessary in order to determine the impacts on the environment and the waste disposal facilities.

DATA REQUEST

67. Please describe how all wastes will be managed and recycled in order to meet the requirements of state and local laws.

Technical Area: Water and Soil Resources
Author: Philip Lowe, P.E., Lorraine White, & Richard Latteri

BACKGROUND

Operation of the Tracy Peaker Project (TPP) will require an average of 29.5 acre feet and a maximum of 52 acre feet of water per year. This water is proposed to be supplied by the Plain View Water District through an existing apportionment of 3.4 acre feet of Central Valley Project water per year per acre. The 40 acres of land owned by GWF Energy, LLC allows a total allocation of 136 acre feet per year with 100% availability of water. Water availability does not always reach 100%, in which case the allocations are reduced proportionately. According to the AFC (AFC Section 8.14.2, Page 8.14-7), the water supply could be reduced to as low as 50% in dry years.

The AFC states that the 40-acre parcel on which the TPP would be built is classified as prime farmland currently in agricultural production (AFC Section 8.9.2.2, Page 8.9-3), and that it is anticipated that the 31 acres not disturbed by the TPP site will continue to be used for agricultural production (AFC Supplement Section 8.14, Page 8.14-7). The AFC also states (AFC Section 8.4.3.1, Page 8.4-7) that the site is not planted at present. Although it appears that this site has been under agricultural production, it is not clear whether this production is current. A maximum of 136 acre feet of water per year is allocated to this parcel. If this allocation has not been used due to the land lying fallow in the past, the 29.5 to 52 acre feet per year required by the TPP could in effect constitute a new use which would affect the allocation to other active users in years when the supply is less than 100%.

The AFC describes the Tracy Biomass Facility as a possible alternative source of water in case the Delta-Mendota supply runs short. The AFC also states that it is not expected that there will ever be a requirement to exercise the delivery option from Tracy Biomass because the TPP average water requirement is far below the total allocation (AFC Supplement Section 8.14, Page 8.14-10). If the 31 acres of agricultural land on the TPP site is or will be used for farming, this could require a substantial additional draw on the total allocation to GWF Energy, LLC and could affect the frequency with which alternative sources of water such as the Tracy Biomass Facility are needed.

The Tracy Biomass Facility has stated that they have not used their Delta-Mendota supply option in the past. It is not clear if this water has been allocated to other users by the Tracy Biomass facility.

DATA REQUEST

68. Please describe whether there will be an agricultural use of water on the 40 acre GWF Energy, LLC parcel in the future, how much water will be required for

agricultural production on an annual and seasonal basis, and how agricultural use of water would affect the water supply for the TPP.

69. Please provide documentation from the Central Valley Project authorizing the conversion of CVP agricultural water to industrial water use.

70. Please provide a summary of the amount of CVP water that has been used by the 40-acre GWF Energy, LLC parcel in the past, and compare this to the total amount that will be used by this parcel after construction of the TPP, including any future agricultural water use. An analysis should be presented to show how the use of water by the TPP and any future agricultural activities on the site could affect the supply to other users of Delta-Mendota Canal water based on the actual amounts that have been delivered by the canal in the past.

71. Please clarify if and how the Tracy Biomass Facility Delta-Mendota water allocation is currently being used, and how the periodic exercise of a TPP option will affect the use of this water by others.

BACKGROUND

The AFC (AFC Supplement Section 8.14, Page 8.14-11) includes a discussion of the State Water Resources Control Board's Resolution 75-58 regarding power plant cooling and alternatives including wet-dry cooling, dry cooling, groundwater and the use of wastewater from the City of Tracy and other nearby communities. All of the options were rejected in the AFC as environmentally unacceptable, economically unsound, or both, but there is no information provided as to what the actual environmental impacts and costs would be, and why these were considered prohibitive in every case except the proposed use of Delta-Mendota Canal water.

DATA REQUEST

72. Please provide details on the feasibility and environmental impacts of alternative water supply and cooling methods in comparison to the proposed use of Delta-Mendota Canal water. The analysis should include, as a minimum:

    a. the use of wastewater from the City of Tracy or other nearby sources;
    b. drilling an onsite supply well; and
    c. importing of brackish water of low quality irrigation return water.

73. The analysis should include a discussion of the following:

    a. alternative water sources currently available and projected to be available over the next twenty to thirty years;
    b. impacts on water use and waste discharge in comparison to those currently proposed for the project;
    c. economic impacts (capital and operating costs including water purchase and infrastructure price);

d. changes in plant and linear facility infrastructure;
e. plant efficiency and output; and
f. environmental impacts (particularly land use, biological and cultural resources, agriculture and soils, geologic hazards, and, traffic & transportation).

BACKGROUND

Construction of the TPP may induce water and wind erosion at the power plant site. Surface water runoff is to be directed around the construction site to minimize erosion and pollutant loading. A Storm Water Pollution Prevention Plan (SWPPP) will be required for construction.

The AFC states that all non-contact runoff from the site will be directed by a network of berms, drainage pipes and culverts into an evaporation/percolation basin located northwest of the TPP (AFC Supplement Section 8.14, Page 8.14-8). The pond is to be designed for a 25-year, 24-hour storm. Contact runoff from exterior areas inside the plant footprint will be directed to a series of catch basins that will deliver it to a holding tank for eventual offsite disposal. The capacities and hydrologic/hydraulic design of this system are not described in sufficient detail to demonstrate that they will function as intended. For instance, in the absence of information on the size of the contact-runoff watershed, it appears that this runoff, which is to be placed in a holding tank, could be generated from an impervious area as large as nine acres. The 24-hour, 25-year runoff from this area could be nearly 1.8 acre feet (using the rainfall depth given in the AFC), which would seem to be impracticably large for a holding tank.

The AFC states that the project will "not require a permit under the General Permit for Discharge of Stormwater Associated with Industrial Activity" by virtue of the fact that the TPP will not discharge stormwater to designated waters of the U.S. (AFC Supplement Section 8.14, Page 8.14-9). This statement is based on the proposed construction of the evaporation/percolation basin and holding tank. The evaporation/percolation basin and holding tank could receive stormwater runoff in excess of the design capacity, or could be full from previous storms at the time of a rainfall event, resulting in overflow. It is not clear how this overflow will be handled, nor what are the associated water quality and regulatory implications.

DATA REQUEST

74. Please provide a draft Erosion Control Plan that identifies all measures that will be implemented at various locations of the project during construction and operation of the proposed TPP including all ancillary and or linear facilities. The draft Erosion Control Plan shall identify all permanent and temporary measures in written form and depicted on a construction drawing(s) of appropriate scale. Show existing and proposed contours at 2 foot intervals showing existing and

proposed watershed areas, peak discharge rates and volumes at key concentration points and conceptual design and capacities of the proposed conveyance system, erosion control features, evaporation/percolation pond and holding tank.

Include in the Erosion Control Plan a discussion and description of how this plan will address encountering non-contaminated groundwater during excavations, as well as any contaminated soil or groundwater that may be excavated or encountered during construction. Specifically address how stormwater coming into contact with any contaminated materials will be collected, treated, and discharged.

The purpose of the plan is to minimize the area disturbed, to protect undisturbed and sensitive areas, to retain sediment on-site and to minimize off-site effects of stormwater runoff. The elements of the plan shall include specific best management measures to be employed to control stormwater runoff during construction and operation at identified locations. In addition, any measures necessary to address Nationwide Permits, as required, should be identified. The plan should also identify maintenance and monitoring efforts for all erosion control measures.

75. Please provide a draft Storm Water Pollution Prevention Plan (SWPPP) consistent with the requirements for a General Storm Water Construction Activity Permit for the TPP property and associated linear facilities that includes site modifications necessary to accommodate the power plant. The plan shall describe all temporary and permanent construction best management plans (BMPs), calculations and assumptions used in determining drainage or containment structure sizes, capacity and appropriate BMPs, and show conceptual design and locations proposed for these BMPs. Also, include in this draft plan potential contaminate spills prevention and countermeasure plan.

76. The contact and non-contact drainage systems and design should be clearly differentiated in terms of location, watershed area, drainage conveyance design, storage system design, peak flow rates and runoff volumes. The plan should include pre-development and post-development storm water discharge rates and volumes for contact and non-contact areas for the 5, 10, 25- and 100-year recurrence intervals, and a description of how frequently runoff volumes are expected to exceed the capacity of the evaporation/ percolation pond and holding tank, and how excess runoff will be accommodated and prevented from carrying contaminants offsite in the event of back-to-back storms or storms in excess of the storage capacity. Please provide a narrative description as well as conceptual plans and design details with all back-up hydrologic and hydraulic calculations used in developing the drainage concept design.

77. Please provide written evidence of consultation with San Joaquin County regarding conformance of the proposed grading plan and storm water facilities with County regulations and policies. If consultation has not been completed,

please provide a schedule of when the County plans to provide comments to the Energy Commission on the grading plan and storm water facilities.

78. Please provide written evidence of consultation with the Regional Water Quality Control Board confirming expected compliance or exemption of the TPP project under the General Permit for Discharge of Stormwater Associated with Industrial Activity. If consultation has not been completed, please provide a schedule of when the County plans to provide comments to the Energy Commission on the grading plan and storm water facilities.

BACKGROUND

According to the AFC (Section 2.2.7.2), bottled water will be brought in for drinking and domestic use. It is not clear if this domestic use includes domestic sanitary use. A septic tank is proposed for disposal of domestic sanitary wastes. The septic tank is described as being a sufficient distance from the nearest groundwater well to avoid adverse impacts to the well, but the location of the septic tank and nearest well are not given.

DATA REQUEST

79. Please provide a description of the amount of water required on a daily basis for domestic purposes and the source of the water used for toilets (potable, recycled or Delta-Mendota),

80. Please provide a plan showing the proposed septic system, the location of and distance to the nearest groundwater wells.

81. Please provide written evidence of consultation with San Joaquin County regarding conformance of the proposed septic system with County regulations and policies.